

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the matter of	)	
	)	
Helen Wong-Armijo	)	WT Docket No. 16-385
FCR, Inc.	)	
Skybridge Spectrum Foundation	)	
Telesaurus Holdings GB LLC	)	
	)	
Applications for Extension and Waiver	)	
of Constructions Deadlines	)	

To: Chief, Wireless Telecommunications Bureau

**CONSOLIDATED REPLY  
TO COMMENTS IN OPPOSITION**

Helen Wong-Armijo and FCR, Inc., Applicants ("Applicants") for Extension and Waiver in the Multilateration Location and Monitoring Service ("M-LMS") of construction requirements for their respective facilities listed in the Bureau's November 10, 2016, *Public Notice* in WT Docket No. 16-385, hereby submit their Consolidated Reply Comments to the Comments in Opposition filed by The Wireless Internet Service Providers Association; Itron, Inc; Landis+GYR Technology, Inc.; and Inovonics Wireless Corporation ("Commenter-s").

Commenters claim to have an interest in this proceeding because they represent various unlicensed Part 15 users of the M-LMS bands. It is their claim that use of the bands for M-LMS licensed operation might cause interference to their or their members' operations. The claim is spurious, amounting to nothing more than an attempt by Part 15 users to claim for their unlicensed use a portion of the licensed spectrum without going through the rulemaking process where competing claims can be fully vetted. Other than

claiming spectrum for unlicensed use, they have no interest in the pending applications of the Applicants.

Commenters' fears are groundless. The Commission's Rules already require the Applicants to satisfy the staff that Applicants' proposals will not cause interference to Part 15 users, among others. In fact, one M-LMS applicant has proposed an operating system that it has demonstrated fully protects Part 15 users, and that system has been approved for deployment. That approval demonstrates that full protection for Part 15 users is feasible and achievable. Any other issue raised by the Commenters has been fully addressed by the Applicants in their respective applications and need not be repeated.

Accordingly, Applicants' requests for extension and waivers should be approved for the reasons stated in the respective applications.

Respectfully Submitted,

HELEN WONG-ARMIJO and  
FCR, INC.

By: */s/ George R. Borsari, Jr.*  
*/s/ Anne Thomas Paxson*

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## CERTIFICATE OF SERVICE

I, Anne Thomas Paxson, a partner in the law firm Borsari & Paxson, hereby certify that a true copy of the foregoing Consolidated Reply to Comments in Opposition was this 9th day of December 2016 sent via email to each of the following:

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/s/ Anne Thomas Paxson